

IN THE DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI

JAMES RIVER INSURANCE COMPANY

PLAINTIFF

V.

CIVIL ACTION NO. 2:25-cv-35-HSO-BWR

RAPID ANALYTICS, LLC,
FERRCANN, INC., and
SADUJA, LLC

DEFENDANTS

DEFENDANT FERRCANN, INC.'S MOTION FOR ENLARGEMENT OF TIME TO
FILE ANSWER OR OTHERWISE RESPOND PRESERVING
ALL AVAILABLE DEFENSES AND OBJECTIONS

Defendant, Ferrcann, Inc. ("Defendant"), while reserving all defenses and objections it may have pursuant to the Federal Rules of Civil Procedure, respectfully moves this Court for additional time within which to raise such defenses, or to answer, plead, or otherwise respond to the Complaint filed in this cause, and in support thereof would show unto the Court the following:

1. Plaintiff's Complaint was filed on May 26, 2024 [Doc. 1].
2. Defendant waived service of process and was served with this Complaint via Email on April 28, 2025.
3. Defendant's current deadline to file its Answer is July 14, 2025.
4. Defendant requires additional time to file responsive pleadings, and has requested and received approval from opposing counsel for an extension of time to file its Answer, making the deadline July 31, 2025. **See Exhibit A, Email.**
5. This motion is not made for the purposes of delay or harassment, but rather so that the interest of justice and fairness may be served.
6. Defendant hereby moves for additional time of 17 days, or **July 31, 2025**, to respond to the Complaint, while reserving all defenses or objections they may have pursuant to

the Federal Rules of Civil Procedure.

Respectfully submitted, this the 14th day of July, 2025.

/s/ Cory N. Ferraez
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Certificate of Service

I, Cory N. Ferraez, do hereby certify that on this date I electronically filed the foregoing with the Clerk of Court through the ECF system, which provided notice to Counsel of Record.

This the 14th day of July, 2025.

By: /s/ Cory N. Ferraez
Cory N. Ferraez, MSB# 104770